

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Capstar Radio Operating Company, a Delaware :
Corporation, :
: Plaintiff, :
: v. : No. 08 CV 2976 (LAK)
: : Filed Electronically
Anthony Campbell; Louis Carpino; Adam Gross; :
Jose Luis Torres; Citadel Broadcasting Corporation, :
a Nevada Corporation; and John Does 1-10, : **NOTICE OF CROSS-MOTION**
: Defendants. :
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PLEASE TAKE NOTICE THAT defendant Citadel Broadcasting Corporation (“Citadel”), by its attorneys Debevoise & Plimpton LLP, upon the accompanying Declaration of Jeremy Feigelson, dated May 5, 2008, the exhibits annexed thereto, the accompanying Memorandum of Law and all prior pleadings and proceedings herein, hereby moves for an order dismissing Citadel for lack of subject matter jurisdiction pursuant to Rules 12(b)(1) and 21 of the Federal Rules of Civil Procedure, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Rule 6.1(b) of the Local Rules of this District Court, opposition papers, if any, are to be served on or before

May 19, 2008, and reply papers, if any, are to be served on or before May 27, 2008.

Dated: New York, New York
May 5, 2008

DEBEVOISE & PLIMPTON LLP

By: /s/ Jeremy Feigelson
Jeremy Feigelson (JF-4963)

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Attorneys for Defendants